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12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA

14 VINCENT BERNARD DAVIS,
15 Plaintiff,
16 v.
17 MARTIN O'MALLEY,
18 Commissioner of Social Security,
19 Defendant.

No. 2:24-cv-01874-CKD

STIPULATED MOTION AND ORDER FOR
AN EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT

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21 IT IS HEREBY STIPULATED, by and between the parties through their respective
22 counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's
23 Motion for Summary Judgment be extended thirty (30) days from October 23, 2024 to November
24 22, 2024. This is Defendant's first request for an extension. Counsel for Plaintiff has no
25 objection to Defendant's request for an extension.

26 Good cause exists for this request. Defendant respectfully requests this additional time
27 because Counsel for Defendant has and will be unable to devote the time required to complete its
28

1 response. Counsel has multiple merit briefs currently due in district court cases within the next
2 week. Counsel for Defendant will also be out of the office on October 18, 2024 and will likely be
3 out of the office for part of next week as well to travel to be with his uncle who has begun end of
4 life hospice care. Given competing workload requirements and pending travel an extension until
5 November 22, 2024 will provide the opportunity for the undersigned Counsel for Defendant to
6 prioritize completing the response to Plaintiff's Motion for Summary Judgment. The undersigned
7 Counsel apologizes to the Court and Plaintiff's counsel for any inconvenience caused by this
8 request and delay. All other dates in the Court's Scheduling Order shall be extended accordingly.

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10 Respectfully submitted,

11 PHILLIP A. TALBERT
12 United States Attorney

13 DATE: October 18, 2024

14 By: s/ Oscar Gonzalez de Llano
15 OSCAR GONZALEZ DE LLANO
16 Special Assistant United States Attorney
17 Attorneys for Defendant

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19 Respectfully submitted,

20 Law Offices of Lawrence D. Rohlfig, Inc., CPC

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22 DATE: October 18, 2024

23 By: s/ Steven Gilbert Rosales *
24 Steven Gilbert Rosales
25 (*as authorized by email)
26 Attorney for Plaintiff
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ORDER

Defendant's motion for extension of time (ECF No. 12) is GRANTED. Defendant shall have an extension, up to and including November 22, 2024, to respond to Plaintiff's Motion for Summary Judgment. SO ORDERED.

Dated: October 22, 2024



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE